#### **IOWA COLLEGE STUDENT AID COMMISSION**

# Western Governors University Application for Postsecondary Registration Renewal in Iowa October 17, 2016

STAFF ACTION: Approve Western Governors University for a two-year registration renewal term that begins retroactively on November 19, 2015 through November 19, 2017.

## **Registration Purpose**

Revised Iowa Code Sections 261B.2 (definitions) and 261B.3 (effective July 1, 2012) require a school to register with the Commission if a person compensated by the school conducts any portion of a course of instruction, including by in-person, distance education, or correspondence method in this State or if the school otherwise has a presence in this State. Presence means a location in Iowa at which a student participates in any structured activity related to a school's distance education course of instruction. Presence also means an address, location, telephone number, or internet protocol address in Iowa from which a school conducts any aspect of its operations. Western Governors University (the University) applied for registration to offer distance education programs. Staff required the University to register because the school is requesting to offer distance education programs to Iowa residents which contain field work to be completed by an Iowa resident student at an Iowa location. In addition, the University employs Iowa faculty who provide instruction or supervision to the University's students.

## **Institutional Information**

Western Governors University is a private non-profit institution whose main offices are located at 4001 South 700 East, Suite 700, Salt Lake City, Utah 84107. The school's chief executive officer is President Scott Pulsipher, at the same location. Due to the fact that the University is applying for registration to offer online programs in Iowa, it has no Iowa contact person. The University is registered with the Iowa Secretary of State as a foreign non-profit corporation, under business number 418553. Its Iowa registered agent is National Registered Agents, Inc. at 400 East Court Ave, Des Moines, Iowa 50309.

Physical Facilities: Not applicable for a distance education program provider.

Accreditation: The University is institutionally accredited by the Northwest Commission on Colleges and Universities, a regionally accrediting agency recognized by the federal Department of Education. The University holds specialized accreditation from the Commission on Collegiate Nursing Education, which is also recognized by the federal Department of Education, for the accreditation of the University's baccalaureate and graduate nursing programs.

Federal Stafford Loan Cohort Default Rate (FFY 2013): 4.8%. For comparison purposes, the FFY 2013, national average cohort default rate is 11.3%.

Graduation Rate: This is the percentage of first-time, full-time undergraduate students who graduated within 150% of the normal time for program completion, as reported to the federal Department of Education. The graduation rate for Western Governors University is 14%.

Average Loan Debt upon Graduation: The average loan debt upon graduation for students of the University in 2014 was \$19,917.

Record Preservation: All aspects of the student's record are electronically stored in the University's primary storage and data center located in Phoenix, Arizona. This may include: Banner records, academic submissions, objective grade and score reports, transcripts, licenses, certifications, and graduation records. All records are redundantly backed up in the Salt Lake City corporate office. The student's record, in its entirety, is maintained in perpetuity.

*Transcript Requests:* Any current or former student may request a transcript by contacting:

Western Governors University
Attn: Student Accounts
4001 South 700 East
Suite 700
Salt Lake City, Utah 84107
877-435-7948 Ext. 3146
records@wgu.edu

https://cm.wgu.edu/t5/Registration-Student-Records/Transcript-Request-Official-WGU/ta-p/149

Official transcripts will not be released to anyone whose financial obligations have not been met.

Instructional Methodology: WGU's instructional delivery methodology is different than many of the colleges and universities that offer online education. Students at WGU do not attend scheduled online classes nor do they have professors in the traditional sense. Students do not earn credit hours but rather competency units, each of which is the equivalent to one semester hour of learning at a traditional university. This equivalency is accepted by the federal Department of Education, WGU's regional and programmatic accrediting agencies and other colleges and universities for the purpose of credit transfers. Tuition is charged at a flat rate every six months; thus, the student pays for time in the program and not for credit hours.

Each degree program is developed by a council of experts in the field who define competencies, i.e., knowledge, proficiencies, and skills that a student needs to possess in order to earn a degree. These competencies form the curriculum and a student must earn a set number of competency units in order to earn a degree. A student earns competency units and fulfills the requirements of a degree plan by demonstrating skills and knowledge in required subject areas through a series of assessments (e.g., tests, performance tasks, scored observation, portfolios). Students are presented with detailed courses of study (comparable to traditional syllabi) that contain the learning steps and activities that are necessary for students to build the required competencies in a subject area and work toward successful completion of the assessments. A course of study contains readings, tutorials, lessons, and tasks/activities that a student completes at his/her own pace.

Each student is assigned a Student Mentor (a WGU employee - not a fellow student) who works with the student via phone, e-mail, and web conferencing throughout the duration of the program. This mentor works with the student to develop a degree plan, helps the student stay on track with his/her plan, coaches the student, and provides practical advice. Students are also assigned a Course Mentor who is a subject matter expert. The type and intensity of instructional support provided by a course mentor varies with each student based on the student's needs in a particular course and may range from help with specific questions to more fully engaged tutorial support. Program faculty at WGU are not instructors but are academic experts with primary responsibility for defining essential competencies for each subject area. They work alongside Student Mentors and Course Mentors to facilitate student learning and success. WGU also employs adjunct faculty as competency evaluators. These employees judge demonstrations of student competence against established proficiency standards on performance assessments.

The student will be assigned a Faculty Mentor who will be the student's partner throughout their education upon becoming a student of the University. The mentor will serve as the student's academic advisor, coach, and a supporter who will help guide the student. As the primary point of contact, the mentor will work with the student through the duration of the entire program. Students will interact closely with their mentor on a regular basis via phone, email, and web conferencing. With the help of their mentor, students will develop a personalized Degree Plan that is consistent with their goals, academic background and career experience, comfort with independent learning, and the amount of time the student will commit to their studies. Mentors are there to ensure that students stay on track, determine when the student is ready for the required assessments, and help the student schedule them accordingly.

Students with prior experience in a subject matter area may progress more quickly through a course of study to the assessment, but WGU's courses of study are not designed to permit a student to "test out" of a course without guided independent study. Successful WGU students spend at least 20 hours per week on their studies. All degree programs offered by the University are fully online. Students work at their own pace within a six-month term to demonstrate their competence in and receive academic credit for each enrolled course. Successful completion of each course requires that the candidate demonstrate proficiency in the knowledge, skills, abilities, and dispositions established in that course's competency statements and corresponding learning objectives. Degrees are awarded based upon successful completion of all program requirements. The University designs its standards-based programs and courses of study and provides a wide variety of self-instructional learning resources from third-party providers to support them.

Students will schedule their own time; it is the students' decision when and where they will complete their schoolwork. There are no scheduled class times, no lectures to log in to, and no grades based on attendance. How a student develops competence is up to them. Students are able to join an online study group, an online learning community, or simply use their textbooks among other learning resources. Students will have the guidance of a mentor to set them up on their path to success, however; the steps that a student takes are solely their decision.

Students have access to the student portal, which acts as a gateway to student communities designed to give students the communication and connectivity they need to be successful in their degree programs. Every course has a learning community.

Student Learning Resources: The University provides a full range of online resources which are available 24/7. The University employs support personnel, available extended hours. Students will need to use a variety of learning resources to acquire the skills and knowledge necessary for successful completion of their assessments. The learning resources come in a variety of forms, including:

- Electronic Textbooks
- Web-based Tutorials
- Simulations
- Videos
- Interlibrary Loan Services

- Course e-Reserves
- Webinars
- Student Learning Communities and Discussion Forums

The University's Central Library, which is made available to students 24/7 through a contractual arrangement with Jones e-global library, is accessible only through the WGU student portal. The University uses Ebrary, a subscription e-Book provides, which gives students access to over 74,000 full-text electronic books. The University's Interlibrary Loan Services provide students access to the extensive collections of the University of Michigan libraries. Once students locate the books they want to use in their research, they can use the Michigan Information Transfer Source Interlibrary loan program to have the books delivered to them. The University of Michigan's libraries provide students of the University with over 94,000 full-text electronic books, in addition to the ones the University has available.

The University charges a \$145.00 Resource Fee each term. The Resource Fee covers the use of the library, e-textbooks, and many other new learning resources. The majority of learning resources are included in the cost of tuition, with the primary exception of those few textbooks which the student is responsible for purchasing. The University has made significant progress on a long-term project to convert to electronic textbooks, nearly 98% of the texts currently utilized in the University's programs are offered digitally.

IT Technical Support: If a student encounters an issue that cannot be resolved with the student's mentor, the Student Support Center is there to step in. In addition to the Student Support Center, the University maintains an IT Service Desk for Technical Support. More information on both of these departments is located at <a href="http://www.wgu.edu/contact\_us">http://www.wgu.edu/contact\_us</a>.

Counseling Services: The University has partnered with Student Resource Services to provide WellConnect to students. WellConnect is a free, voluntary, and confidential service that offers counseling and support services to students. The services include: budget and debt consultation, legal consultation, new parent transition program, and community referrals. WellConnect provides support with a live chat clinician available 24/7, via phone. More information on WellConnect is available at <a href="http://wellconnect.wgu.edu/">http://wellconnect.wgu.edu/</a>.

Curriculum Evaluation and Development: Core faculty members of the University, including the Provost and Associate Provosts, oversee academic programs, are involved in faculty selection and training, participate in curricular oversight, provide instructional leadership, manage online learning communities, develop assessments, and develop courses of study which are used to provide support and structure for student preparation for assessments.

University faculties traditionally share responsibility for numerous academic functions, including: oversight of the content of the curriculum, the designation of educational outcomes,

the design and delivery of instruction, the evaluation of student learning and achievement, and the advisement of students. At the University, every function is found within the faculty, however; those responsibilities are distributed among different groups of faculty.

At the University, the core faculty comprises three groups: Program Council Faculty, Administrative Faculty, and Mentors. Together, these groups share oversight responsibility for the quality and content of the curriculum and instruction.

Each of the University's Colleges has its own Program Council. Additionally, and Assessment Council oversees the approach by which the University assesses student competence. Council members are University senior faculty. The Program Council of the University's College includes external academic and professional experts and leaders representing the disciplines within the College. These faculty members are responsible in identifying and defining the statements of student competence that make up the academic programs within the College. Additionally, they review and approve the curricula created to achieve those outcomes and evaluate the success of the programs. The Assessment Council includes recognized experts in the technical construction and appropriate uses of assessment instruments and procedures, ensuring valid, reliable assessments designed to accurately measure competence.

The Administrative Faculty is comprised of the Provost and Academic Vice President, five Associate Provosts, College Directors, Directors/ Managers of other academic departments, and College Program and Product Managers. These faculty members serve as members of the academic leadership and management teams of the University. As guided by the Board of Trustees, President, and Program Councils, the academic programs faculty creates and evaluates the curriculum.

There are two mentor roles at the University. The Course Mentor, or subject matter expert, is responsible for the success of students in the Courses of Study (COS). These mentors provide academic help for students in their COS, facilitate communities, work closely with Program and Product Managers to improve learning resources (LRs), and supervise capstone projects. Additionally, they assist Product Managers with degree program development, review and launch, and with COS development in their areas of specialty.

The second mentor role is the Student Mentor. The Students Mentor develops plans of study and verifies plans of study for students. Student Mentors help students work through difficulties, study plans, LRs, assessments, help students stay on plan, and provide feedback on assessments.

Student Complaints Process: The University maintains two policies for filing complaints, informal complaints and formal complaints.

Informal Complaints: An informal complaint can arise from any student dissatisfaction. The University encourages students to handle complaints as close to the source as possible by discussing issues with the relevant department, staff member, or supervisor within the University. This practice allows issues to be resolved more quickly by individuals with required expertise.

Formal Complaints: If a student is unsure how to approach a concern or an earlier complaint cannot be resolved informally, the student may initiate a formal complaint by sending a written explanation of the concern to the University Student Services, <a href="mailto:studentservices@wgu.edu">studentservices@wgu.edu</a>. The written complaint must describe who has been involved, the current status of the concern, and steps taken to resolve the concern informally.

Student Services will work to resolve each complaint and in every case will respond within 10 business days. If Student Services is not able to resolve the concern to the student's satisfaction, within five business days, the student may appeal the decision by submitting a brief, written summary of the concern to the University's Associate Provost for Academic Services. The decision of the Associate Provost shall be final.

In the event that a student believes that their issue with the University cannot be resolved through the grievance and complaint processes the University has in place, the student may contact the accrediting agency and/ or their state agency. More information may be found at, <a href="https://cm.wgu.edu/t5/Student-Rights-Responsibilities/Consumer-Complaint-Process/ta-p/160">https://cm.wgu.edu/t5/Student-Rights-Responsibilities/Consumer-Complaint-Process/ta-p/160</a>.

## **Distance Education Programs Offered In Iowa**

WGU applied for registration to continue offering lowans the distance education programs listed below. Online periods of enrollment are structured in six-month terms. Tuition costs per six month term in each program are listed below. Tuition covers all work a student completes during the term, no matter how many competency units the student earns during a term. WGU does not charge by the credit hour or competency unit. WGU cannot predict average total program costs since WGU students progress at their own pace through a program based on their prior education and experience and how much time and effort they are able to devote to their studies. WGU cannot estimate average costs of texts and other learning resources, since these vary from program to program and from student to student. The student determines which learning resources to use in consultation with his or her mentor

Set fees that apply to all students, or that are program-specific, are as follows:

- Application fee: \$65 (nonrefundable),
- Resource fee: \$145 per term. This fee covers the use of the library, e-textbooks and other learning resources.
- Science Lab Fee: \$350 (one time). Individuals pursuing either of the science bachelor's degrees or science master's degrees that require a home science lab will be assessed this one-time charge, which is billed separately along with the first term's tuition.
- Consolidated Nursing Program Fee: \$350 (one-time). Individuals pursuing a nursing degree will be assessed this one-time charge, which is billed separately along with the first term's tuition.
- Demonstration Teaching: \$1000. Individuals in a Teachers College program that includes student teaching must pay a \$100 application fee, plus a \$900 demonstration teaching fee prior to their in-classroom teaching practicum.
- Internship Teaching Model: \$1,900 (one time). Individuals in a Teachers College
  program that includes student teaching will be assessed a one-time charge for the
  Demonstration Teaching fee, either the standard fee or the Internship Model fee. The
  Internship Model fee applies only to those individuals who will student teach under the
  internship model for an entire school year.

 M.S. in Educational Leadership Practicum: \$1,000 (one time). Individuals pursuing the M.S. in Educational Leadership will be assessed this one-time fee in their last term as they complete this practicum experience

# Undergraduate Programs (excluding educator programs)

- Bachelor of Science in Business Management: \$2,890/term
- Bachelor of Science in Healthcare Management: \$2,890/term
- Bachelor of Science in Human Resource Management: \$2,890/term
- Bachelor of Science in Information Technology Management: \$2,890/term
- Bachelor of Science in Marketing Management: \$2,890/term
- Bachelor of Science in Accounting: \$2,890/term
- Bachelor of Science in Management/ Data Analytics: \$2,890/term
- Bachelor of Science in Information Technology: \$2,890/term
- Bachelor of Science in Network Administration: \$2,890/term
- Bachelor of Science in Information Technology, Security: \$2,890/term
- Bachelor of Science in Software Development: \$2,890/term
- Registered Nurse to Bachelor of Science in Nursing: \$3,250/term
- Bachelor of Science in Health Informatics: \$2,890/term

# Graduate Programs (excluding educator programs)

- Master of Business Administration: \$3,250/term
- Master of Business Administration, Information Technology Management: \$3,250/term
- Master of Business Administration, Healthcare Management: \$3,250/term
- Master of Science in Integrated Healthcare Management: \$3,250/term
- Master of Science in Management and Leadership: \$3,250/term
- Master of Science in Accounting: \$3,250/term
- Master of Science in Cybersecurity and Information Assurance: \$2,890/term
- Master of Science in Information Technology Management: \$2,890/term
- Master of Business Administration, Information Technology Management: \$3,250/term
- Master of Science in Nursing Education: \$3,250/term
- Master of Science in Nursing, Leadership and Management: \$3,250/term
- Master of Science in Nursing, Education (Registered Nurse to Master of Science in Nursing): \$3,250/term
- Master of Science in Nursing, Leadership and Management (Registered Nurse to Master of Science in Nursing): \$3,250/term
- Master of Science in Integrated Healthcare Management: \$3,250/term
- Master of Business Administration, Healthcare Management: \$3,250/term

# Educator Programs for Already Licensed Teachers

- Master of Science in Curriculum and Instruction: \$2,890/term
- Master of Science in Special Education: \$2,890/term
- Master of Science in Educational Leadership: \$2,890/term
- Master of Arts in English, Language Learning: \$2,890/term
- Master of Arts in English, English as a Second Language: \$2,890/term

- Master of Education, Instructional Design: \$2,890/term
- Master of Education, Learning and Technology: \$2,890/term
- Master of Arts in Mathematics Education: \$2,890/term
- Master of Arts in Science Education: \$2,890/term
- Master of Arts in Science Education, Chemistry: \$2,890/term
- Master of Arts in Science Education, Physics: \$2,890/term
- Master of Arts in Science Education, Biological Science: \$2,890/term
- Master of Arts in Science Education, Geosciences: \$2,890/term

# First Time Licensure Educator Programs

The University offers the following first-time educator licensure programs to its students. These programs were approved in November of 2011 by the Iowa Department of Education for inclusion in the University's authorized program list. However, successful completion of the University's programs of educator preparation does not quality the student for initial educator licensure by the Iowa Board of Educational Examiners. The student receives the Standard teaching license or an administrator's license awarded by Utah's Department of Education, and then the student may submit an application to the Iowa Board of Educational Examiners for an Iowa license.

Staff observe that Western Governor's University maintains diligent attention to changes in lowa law and rule that impact educational requirements for persons who are seeking licensure in lowa as educators. The University reacts to such changes as they occur promptly, by conducting comparisons with their curriculum for lowa residents and making course content modifications as necessary.

The cost of each program below is \$2,890 per six month term.

- Bachelor of Arts in Interdisciplinary Studies
- Bachelor of Arts in Special Education
- Bachelor of Arts in Mathematics
- Bachelor of Arts in Science
- Bachelor of Arts in Science, Chemistry
- Bachelor of Arts in Science, Physics
- Bachelor of Arts in Science, Biological Science
- Bachelor of Arts in Science, Geosciences
- Post-Baccalaureate Teacher Preparation, Elementary Education
- Post-Baccalaureate Teacher Preparation, Mathematics
- Post-Baccalaureate Teacher Preparation, Science
- Post-Baccalaureate Teacher Preparation, Social Science
- Master of Arts in Teaching, Elementary Education
- Master of Arts in Teaching, English
- Master of Arts in Teaching, Mathematics
- Master of Arts in Teaching, Science
- Master of Arts in Teaching, Social Science

Field Experience: The University has integrated a form of field experience into a number of programs available through distance education. The field experiences are either an individual

course or a combination of courses that may require the student to complete work at an lowa location.

The first type of field experience is the Preclinical Experiences (PCE). PCE are early field experiences that will comprise both video and live classroom exercises designed to support objectives set by the University. PCE provides a guided practice environment in which students can begin developing desired teaching knowledge and skills. PCE prepares each student for the in-school field experience, Demonstration Teaching.

The second type of field experience is the teaching experience. The teaching experience is called a Demonstration Teaching (DT). DT is a full-time, supervised, in-classroom experience that lasts a minimum of 12-20 weeks. During DT, students will be hosted by an experienced teacher. Students will undergo a series of at least six observations by a Clinical Supervisor, who is employed by or under contract with the University, and also receive evaluations from their host teacher to evaluate their own performance based on accepted professional standards. A Placement Specialist from the University will work with students to set up each student's placement. The process of setting up a placement can take up to six months. Students may be required to assist in locating a placement and commuting up to two hours if necessary. Students are not permitted to work during their DT experience. DT may not be waived and prior experience may not be used to satisfy the requirement. The length of time a student must devote to their experience solely depends on the grade level that they are working toward teaching, as follows:

- Early Childhood: Early childhood placements are a minimum of 12 weeks long, with six weeks in a prekindergarten or kindergarten setting and six weeks in grades 1-3.
- Elementary Education: Elementary education candidates require placement for a minimum
  of 12 weeks in a full-day, multi-subject, elementary classroom that includes at minimum
  either language arts or math and any other core classes. Some states and districts may
  require the student to participate at more than one level. A kindergarten placement may
  not satisfy the requirements. This placement must take place in an elementary school and
  in a grade 1-6 setting.
- Secondary Education: Secondary education candidates require a minimum of 12 weeks
  full-time at the appropriate grade level and in the content area for which the candidate will
  be recommended for licensure. Some states and districts may require the candidate to
  participate at more than one grade level and in more than one content area.
- Special Education: Special education placements are a minimum of 16 weeks long with eight weeks in a standard, multi-subject, elementary education setting hosted by a regular elementary educator and eight weeks in a secondary special education setting with a secondary special education educator who teaches core classes.

The students who are already contracted teachers may complete their DT in their own classroom if they meet the following conditions:

- Student is enrolled in a WGU teacher licensure or endorsement program and that program aligns with their grade level and the state license the student is seeking.
- Student is contracted to teach in an accredited public school or accredited private school.
- Student's district and school support the placement.
- Student follows the regular application process and meets all deadlines and requirements.
- Student participates in DT during a regularly scheduled cohort year.
- Student participates in their assigned cohort seminar and completes all other requirements.

 Student participates in standard observations and evaluations with their clinical supervisor from the University.

The following distance education programs include both PCE and DT field experiences:

- Bachelor of Arts, Interdisciplinary Studies
- Bachelor of Arts, Special Education
- · Bachelor of Arts, Mathematics
- Bachelor of Arts, Science
- Bachelor of Arts, Science Physics
- Bachelor of Arts, Science Chemistry
- Bachelor of Arts, Science Biological Science
- Bachelor of Arts, Science Geosciences
- Post- Baccalaureate Teacher Preparation, Elementary Education
- Post- Baccalaureate Teacher Preparation, Mathematics
- Post- Baccalaureate Teacher Preparation, Science
- Post- Baccalaureate Teacher Preparation, Social Science
- Master of Arts in Teaching, Elementary Education
- Master of Arts in Teaching, English
- Master of Arts in Teaching, Mathematics
- Master of Arts in Teaching, Science
- Master of Arts in Teaching, Social Science

# The following programs contain different field experiences:

- Master of Science, Special Education: This program contains two field experiences. The
  first of these is a 240 hour in-class supervised teaching practicum. The second is a
  Capstone experience that provides students with opportunities for practical application at
  advanced levels in special education classrooms. Sample activities include professional
  readings, interviewing and/or shadowing special education professionals, attending
  Education Plan meetings, and six in-class supervised teaching experiences. Both of these
  field experiences should occur at the same site.
- Master of Arts, English Language Learning/English as a Second Language: This program contains a 30 hour field experience as well as a teacher work sample, which must be completed in the same placement. The clinical supervisor and host teacher, which are approved by the University, provide students with detailed feedback regarding the student's performance. The field experience requires two observations and one final evaluation at the end of the field experience. Observations are conducted by a WGU clinical supervisor who is a part-time, disciplined, trained faculty teacher.
- Master of Science, Educational Leadership/ Endorsement Preparation Programs: In these
  programs students complete a six month practicum that involves close interaction with a
  school administrator in a practicum school site and the completion of nine tasks. Field
  experience activities take place at both the elementary and secondary levels and occur
  during the concluding term of the program. All field experience hours must be conducted at
  the assigned school or during school-related activities in the community. The practicum
  requires two observations and two evaluations. Observations are conducted by a WGU
  clinical supervisor who is a part-time, disciplined, trained faculty teacher.
- Master of Arts, Mathematics or Science Education: These programs include two Capstone experiences: a two-week field experience, and a teacher work sample oral defense. The

student's placement must be in an area approved by the host teacher or principal. Once students receive official clearance to participate in school activities, students will complete field experience assessments in TaskStream.

# **Registration Compliance**

As required by Iowa Code Section 261B.4, the University discloses its institutional policy for refunding tuition charges to students who withdraw from its programs in its Institutional Catalog and Handbook. The University discloses this policy to students in its online Catalog at <a href="http://www.wgu.edu/wgu/institutional\_catalog.pdf">http://www.wgu.edu/wgu/institutional\_catalog.pdf</a>. Iowa registration law and rule do not govern the University's tuition refund policy because it is not a for-profit institution.

Administrative rules specifically require the school to comply with the requirements of Chapter 261.9(1) "e" through "h".

- Iowa Code Section 261.9(1)(e) requires a school to maintain and disseminate a drug and alcohol abuse policy that includes sanctions for violation of the school's policy and information about the availability of drug or alcohol counseling or rehabilitation. Iowa Code Section 261.9(1)(f) requires a school to maintain and disseminate a sexual abuse policy that includes information about counseling opportunities and reporting instances of sexual abuse to school officials and law enforcement. These requirements duplicate policies and disclosures required by the federal Department of Education for a school that participates in the federal student aid programs. The University complies with the requirements of Iowa Code Section 261.9(1)(e) and (f), and discloses these policies to students in various locations and documents posted on its website, as follows:
  - ✓ http://www.wgu.edu/wgu/institutional catalog.pdf
  - ✓ <a href="https://cm.wgu.edu/t5/Student-Rights-Responsibilities/Discrimination-Harassment-Sexual-Misconduct-Stalking-and/ta-p/118">https://cm.wgu.edu/t5/Student-Rights-Responsibilities/Discrimination-Harassment-Sexual-Misconduct-Stalking-and/ta-p/118</a>
  - √ <a href="https://cm.wgu.edu/t5/Student-Rights-Responsibilities/Drug-and-Alcohol-Policies-and-Programs/ta-p/164">https://cm.wgu.edu/t5/Student-Rights-Responsibilities/Drug-and-Alcohol-Policies-and-Programs/ta-p/164</a>
  - ✓ <a href="https://cm.wgu.edu/t5/Student-Rights-Responsibilities/Annual-Security-Report/ta-p/125">https://cm.wgu.edu/t5/Student-Rights-Responsibilities/Annual-Security-Report/ta-p/125</a>
  - ✓ <a href="https://cm.wgu.edu/t5/Student-Rights-Responsibilities/Timely-Warning-and-Special-Alerts/ta-p/113">https://cm.wgu.edu/t5/Student-Rights-Responsibilities/Timely-Warning-and-Special-Alerts/ta-p/113</a>
  - ✓ <a href="https://cm.wgu.edu/t5/Student-Rights-Responsibilities/Dating-Violence-Domestic-Violence-Sexual-Assault-and-Stalking/ta-p/108">https://cm.wgu.edu/t5/Student-Rights-Responsibilities/Dating-Violence-Domestic-Violence-Sexual-Assault-and-Stalking/ta-p/108</a>
  - √ <a href="https://cm.wgu.edu/t5/Student-Rights-Responsibilities/Code-of-Student-Conduct/ta-p/129">https://cm.wgu.edu/t5/Student-Rights-Responsibilities/Code-of-Student-Conduct/ta-p/129</a>
  - √ <a href="https://cm.wgu.edu/t5/Student-Rights-Responsibilities/Safety-Awareness-and-Crime-Prevention/ta-p/116">https://cm.wgu.edu/t5/Student-Rights-Responsibilities/Safety-Awareness-and-Crime-Prevention/ta-p/116</a>
  - √ <a href="https://cm.wgu.edu/t5/Student-Rights-Responsibilities/Counseling-and-Support-Resources/ta-p/114">https://cm.wgu.edu/t5/Student-Rights-Responsibilities/Counseling-and-Support-Resources/ta-p/114</a>
- Iowa Code Section 261.9(1)(g) requires a school to maintain a special policy for refunding tuition and mandatory fees for members of the Iowa National Guard or reserve members of the U.S. Armed Forces, or the spouse of such a member if the member has a dependent child, when the service member or spouse must withdraw from the school because the service member has been called to active state or federal military duty or service. The University maintains a compliant policy, which can be found at <a href="https://cm.wgu.edu/t5/Registration-Student-Records/Military-Mobilization/ta-p/76">https://cm.wgu.edu/t5/Registration-Student-Records/Military-Mobilization/ta-p/76</a>.

• Iowa Code Section 261.9(1)(h) requires a school to develop and implement a policy requiring employees who in the course of their employment, attend, examine, counsel, or treat a child to report suspected incidents of child physical and sexual abuse to law enforcement and to the school. By cross-reference to existing administrative rules for registration [283-21.2(261B), subsection 7], this policy applies to schools that offer distance education programs and that have lowa-resident employees or contractors. WGU maintains a compliant policy that it discloses via electronic mail to all new employees based in lowa during the orientation process. In addition, WGU will electronically distribute the policy to all lowa-based WGU staff once per year.

Student Consumer Information: In its registration application, the University affirms its willingness to comply with the requirements of Iowa Code Chapter 261.9, as stipulated by Iowa Code Section 261B.4(8). Chapter 261.9 requires a school to disclose to students information about the school's programs, charges, tuition refund policies, whether a certificate or diploma awarded by the school is applicable toward a degree program the school offers, and the identity of the school's accrediting agency. These disclosures are duplicative of the federal Department of Education's student consumer information disclosure requirements for a school that participates in the federal student aid programs. The University provides these disclosures in its Catalog, <a href="http://www.wgu.edu/wgu/institutional\_catalog.pdf">http://www.wgu.edu/wgu/institutional\_catalog.pdf</a> as well as on its website in the following locations:

- <a href="http://www.wgu.edu/degrees\_and\_programs">http://www.wgu.edu/degrees\_and\_programs</a>
- http://www.wgu.edu/tuition\_financial\_aid/tuition
- <a href="https://cm.wgu.edu/t5/Registration-Student-Records/Institutional-Withdrawal-Refund-Policy/ta-p/87">https://cm.wgu.edu/t5/Registration-Student-Records/Institutional-Withdrawal-Refund-Policy/ta-p/87</a>
- https://cm.wgu.edu/t5/Financial-Services/Tuition-and-Fees-Amount/ta-p/57
- <a href="https://cm.wgu.edu/t5/Financial-Services/Tuition-Payment-and-Financial-Policies/ta-p/145">https://cm.wgu.edu/t5/Financial-Services/Tuition-Payment-and-Financial-Policies/ta-p/145</a>
- https://cm.wgu.edu/t5/About-WGU/Accreditation/ta-p/178

Western Governors University affirms on the application that it will comply with the provisions of Iowa Code Section 261B.7, which state that provided the school does not claim "approval" or "accreditation," the school must disclose to students that it is registered by the Commission and provide Commission contact information for students who have questions or complaints about the school. The University provides this information to Iowa-resident students on its complaint process page at

http://sh.wgu.edu/articles/StudentHandbook/2667/?q=iowa&l=en\_US&fs=Search&pn=1.

Financial Responsibility: The University submitted a copy of an independent audit conducted by Mayer Hoffman McCann P.C., dated October 17, 2014 for the institutional fiscal years ending June 30, 2014 and 2013. The auditing firm expressed its opinion that the financial statements of the University present fairly, in all material respects, the financial position of the University.

A private non-profit institution that participates in the federal student aid programs must maintain a composite score, based on a three factor financial responsibility ratio, of at least 1.5 in order to be determined "financially responsible" without additional oversight. The most recent composite score for Western Governors University verified by the federal Department of Education is for the institutional fiscal year ending June 30, 2014: 2.8 (out of a possible 3.0).  The institution is not required to calculate the percentage of its revenue derived from federal student aid funds since it is not a for-profit institution. The University voluntarily discloses on its website that 76% of students enrolled at the University receive some form of federal aid.

Full-Time Iowa Resident Faculty Member or Program Coordinator: Iowa administrative rules exempt a school from employing a full-time, Iowa-based faculty member or program coordinator if the school applies for authorization to offer only distance education programs. Western Governors University employs 13 Iowa resident faculty members who provide instruction to the University's students, seven of which are full-time, and six of which are part-time. The University does not employ any Iowa residents who perform other operational activities for the University.

Instructional/Supervisory Staff Qualifications: Of the 13 lowa resident faculty members, staff was able to verify the credentials of eight. Five of the eight faculty members hold masters level degrees in fields such as business administration, health care administration, instructional design, nursing, and nursing education. Three of the eight faculty members hold doctoral level degrees in the fields of law and psychology.

As of July 2016, the University reported that it employs more than 2,000 full-time faculty members and 700 part-time faculty members. "Faculty" at the University includes individuals who have roles as a Course Mentor or Student Mentor, whose responsibilities are summarized at <a href="http://www.wgu.edu/about\_wgu/employment/faculty-mentors">http://www.wgu.edu/about\_wgu/employment/faculty-mentors</a>. 1,144 of these individuals provide subject-specific guidance or other academic support to lowa residential students. Due to such a large number of faculty, staff reviewed the credentials of 40 faculty members at random from each of the University's Colleges.

- College of Business: Out of 40 individuals whose credentials were reviewed, three hold various baccalaureate degrees. Thirty-two of the 40 faculty members hold master level degrees in fields such as business administration, education, public administration, and social work. Five of the 40 faculty members hold doctoral level degrees in law or education.
- College of Health Professions: Out of 40 faculty members, one faculty member holds a
  Bachelor of Science in Nursing degree. Thirty-one of the 40 faculty members hold
  masters level degrees in fields that include business administration, music, and nursing.
  Eight of the 40 faculty members hold doctoral degrees in education or nursing.
- College of Information Technology: Out of 40 faculty members reviewed, six faculty
  members hold various baccalaureate degrees. Twenty-eight of the 40 hold master level
  degrees in fields such as business administration, education, and fine arts. One of
  these instructors is a doctoral degree candidate. Five of the instructors hold doctoral
  degrees.
- College of General Education: Out of the 40 faculty members reviewed, six hold various masters degrees in fields such as education and teaching. Thirty-four of the 40 faculty members hold doctoral degrees.

 Teachers College: Out of 40 faculty members reviewed, seven hold baccalaureate degrees. Twenty-five of the 40 faculty members hold masters level degrees in fields such as business administration, education, learning technologies, and teaching. Eight of the 40 faculty members hold doctoral degrees in education.

Commitment to Iowa Students and Teach-Out: By executing an electronic signature on the registration application, Western Governors University's former President and CEO, Robert W. Mendenhall, PhD, committed to the delivery of programs the University offers and agreed to provide alternatives for students to complete programs at the University or another school if the University closes a program, or if the University closes before students have completed their courses of study.

Student Complaints: None.

# **Compliance with Iowa Code Chapter 714**

Section 714.18 – Evidence of Financial Responsibility

WGU applied for and was granted an exemption from the financial responsibility obligations of lowa Code Section 714.18. The University claimed the exemption that applies to "colleges and universities authorized by the laws of lowa or any other state or foreign country to grant degrees." To substantiate its exemption claim, WGU provided a copy of Washington State House of Representatives Bill #1822, which was enacted into the laws of the State of Washington on July 22, 2011. This legislation states in part, "The legislature intends to partner with Western Governors University, a regionally and nationally accredited nonprofit and independent university, to establish Western Governors University – Washington. . .The legislature further intends that the institution be recognized as a Washington baccalaureate degree-granting institution that is self-supporting and does not receive state funding."

Section 714.23 – State Tuition Refund Policy

The lowa tuition refund policy does not apply to Western Governors University because it is not a for-profit institution.